

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking Regarding
Microgrids Pursuant to Senate Bill 1339 and
Resiliency Strategies.

Rulemaking 19-09-009
(Filed September 12, 2019)

**COMPLIANCE FILING OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
PURSUANT TO DECISION 20-06-017 ORDERING PARAGRAPH 4 DESCRIBING
THE RESULTS OF THE REQUIRED ACTIONS TO ACCELERATE
INTERCONNECTION OF RESILIENCY PROJECTS**

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February 16, 2021

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Pursuant to Ordering Paragraph (“OP”) 4 of the *Decision Adopting Short-Term Actions to Accelerate the Deployment of Microgrids and Related Resiliency Solutions*¹ (“Decision”), San Diego Gas & Electric Company (“SDG&E”) submits this compliance filing describing the results of the required actions to accelerate interconnections, described in the Decision’s Section 4.1.3.²

I. THE DECISION’S COMPLIANCE REQUIREMENTS

Through a series of advice letters outlined in OPs 1-3,³ the Commission required the investor-owned utilities (“utilities” or “IOUs”) to prioritize, streamline, and expedite review and approval of key resiliency projects by providing:

- Pre-approved template single-line diagrams (“SLDs”) for the interconnection application process;
- Specific technical criteria used to determine where field inspections are necessary for grid safety and reliability and the process by which utilities will accept videos,

¹ Decision (“D.”) 20-06-017, OP 4 at 119.

² *Id.* at 23-24.

³ *Id.* at 117-119.

photos, and virtual inspection, along with attestations of authenticity and accuracy from the contractor; and

- Additional interconnection staffing, as needed, or the internal process changes needed to fulfill the goals of the Decision.

The Decision's OP 4 requires the utilities to each submit this compliance filing to provide the results of these required actions.⁴

II. SDG&E'S COMPLIANCE ITEMS

SDG&E's compliance filing includes the elements required by the Decision, as set forth below. Additional information requested by the Commission's Energy Division ("ED") staff pursuant to OP 4 are denoted in bold italics.⁵

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⁴ Decision, OP 4 at 119, provides in pertinent part (emphasis added):

... [The IOUs] shall submit compliance filing on February 15, 2021 in this proceeding and to Energy Division at energydivisioncentralfiles@cpuc.ca.gov, that describes the results of the required actions described under Section 4.1.3. *The utilities are ordered to discuss, with Energy Division, what specific information is necessary before filing the compliance filing.* Nevertheless, items that must be reported in this compliance filing shall include: (a) description of the number of projects that utilized the interconnection proposals adopted in this decision; (b) the success in meeting Rule 21 interconnection timeliness; (c) if any project experienced a delay, the utility shall provide an explanation about why the project was delayed; and (d) the utilities shall track the number and type of projects that use the template-based interconnection process adopted in Interconnection Proposal 1.

⁵ *Id.* ED staff provided the utilities with additional guidance via email on January 19, 2021.

A. Description of the number and types of projects utilizing the interconnection proposals adopted in this Decision⁶

- *For each of the interconnection proposals adopted in D.20-06-017, indicate the project types (photovoltaic, standalone energy storage, photovoltaic plus energy storage, other) utilizing the proposal and both the quantity of projects and total MW capacity for each project type. If not possible to achieve this level of disaggregation for each project type, provide a brief explanation why and indicate the aggregate quantity of projects and aggregated total MW capacity for each proposal.*
- *To the extent feasible differentiate between projects successfully interconnected and those that are pending interconnection.*
- *Some IOUs expressed that some single line diagram templates were available prior to D.20-06-017 so all projects utilizing templates might not be attributable to D.20-06-017. The IOU may show how many additional projects began using templates after the decision or the IOU may show many projects in total are utilizing templates after the decision.*

In 2013, SDG&E launched its Distribution Interconnection Information System (“DIIS”) online interconnection application portal for Rule 21 interconnections, including Net Energy Metering (“NEM”) interconnections. At the same time, SDG&E implemented a template SLD within the online application for NEM customers installing solar systems sized at 30 kilowatts (“kW”) or kilovolt-amperes (“kVA”) or less, that either do not require a disconnect or are equipped with a current transformer-rated utility billing meter. This template addresses approximately 98% of the interconnection applications submitted through SDG&E’s online portal annually.

As described in Advice Letter 3572-E,⁷ SDG&E developed additional template SLDs representing four additional project types in compliance with the Decision:

⁶ Decision, OP 4 (a) at 119.

⁷ *Information on SDG&E’s Pre-approved Template Single-Line Diagrams for the Interconnection Application Process Pursuant to Decision 20-06-017* (accepted effective August 17, 2020).

- Rule 21 non-export storage facilities ≤ 10 kW/kVA
- Rule 21 non-export storage facilities ≤ 10 kW/kVA
- Rule 21 energy storage ≤ 10 kW/kVA storage paired with solar ≤ 30 kW/kVA – AC-coupled systems (*i.e.*, separate inverters for solar and storage)
- Rule 21 energy storage ≤ 10 kW/kVA storage paired with solar ≤ 30 kW/kVA – DC-coupled systems (*i.e.*, single inverter for solar and storage)

Since SDG&E implemented the SLDs complying with the Decision in August 2020, three (3) applicants have used the new SLDs. Consistent with SDG&E's approval timing track record, these applications were approved within two (2) business days following the receipt of a complete application. This timing is consistent with SDG&E's performance prior to the Decision.

B. Success in meeting Rule 21 interconnection timelines⁸

- *IOUs indicated in their advice letters that additional staffing levels were not necessary, or helpful, to meeting Rule 21 interconnection timelines. Indicate whether IOU continues to believe this to be true and explain why. Include any pertinent information if IOU now expects staffing levels will need to be increased.*

SDG&E continues to meet or exceed the expectations of its interconnection applicants. At this time, SDG&E has not identified any opportunities to streamline the interconnection process through increased staffing. However, to maintain its high level of customer service and to ensure compliance with the Decision, SDG&E will continue to monitor its processes and performance, hiring additional staffing as the need arises. During the month of January 2021, the average approval time for residential NEM projects was 2.2 calendar days and 2.3 calendar days for non-residential projects.

⁸ Decision, OP 4 (b) at 119.

C. If any project experienced a delay, the utility shall provide an explanation about why the project was delayed⁹

- *Length of delay.*
- *Type of project and capacity (MW) that experienced the delay.*
- *Explanation of how the IOU responded to the delay.*
- *Resolution to the delay.*
- *Brief explanation of why additional staffing would not have made a substantive difference in the length of delay.*

No projects have experienced delays since the Decision issued. This performance is consistent with SDG&E's reported staffing and resources in Advice Letter 3590-E.¹⁰

D. The IOUs shall track the number and type of projects that use the template-based interconnection process adopted in Interconnection Proposal 1¹¹

- *This should be per single line diagram template and include total MW capacity.*
- *Include information on any concerns with the templates expressed by project applicants or developers.*
- *Some IOUs expressed that some single line diagram templates were available prior to D.20-06-017 so all projects utilizing templates might not be attributable to D.20-06-017. The IOU may show how many additional projects began using templates after the decision or the IOU may show many projects in total are utilizing templates after the decision.*
- *Include discussion of any additional project types that could benefit from development of template single line diagrams. If IOU does not recommend development of any additional templates, include an explanation of why.*

Since they were implemented in August 2020, three (3) applicants have used the new SLDs, for projects totaling 27 kW in nameplate capacity, as follows:

⁹ *Id.*, OP 4 (c) at 119.

¹⁰ [*SDG&E Interconnection Staffing Pursuant to Decision 20-06-017*](#) (accepted effective September 16, 2020).

¹¹ Decision, OP 4 (d) at 119.

- Rule 21 energy storage (4.7 kW) paired with solar (4.606 kW) – DC-coupled
- Rule 21 energy storage (5 kW) paired with solar (3.512 kW) – AC-coupled
- Rule 21 energy storage (5 kW) paired with solar (4.390 kW) – AC-coupled

Neither project developers nor applicants have expressed any concerns with the templates to date.

E. Information on SDG&E’s monitoring of field inspection failure rates and information on any progress towards implementation of a virtual inspection process that would result in timelier inspections

- *The February 15, 2021 filing should include information on SDG&E’s monitoring of field inspection failure rates and information on any progress towards implementation of a virtual inspection process that would result in more timely and responsive inspections.*
- *Document any instances where inspections could have been performed virtually but a field inspection was completed instead. Include an explanation of why.*

SDG&E has not historically tracked inspection failure rates. Approximately 76% of all SDG&E interconnection application approvals are accomplished using virtual inspections. The bulk of the remaining applications, including projects larger than 30 kW,¹² are eligible to participate in the virtual application process. However, applicants have not elected to do so for these larger projects. The balance of projects, which are significantly larger and more complex, are not appropriate for a virtual inspection process.

¹² As described in Advice Letter 3573-E, SDG&E has recently eliminated the field inspection requirement for projects larger than 30 kW that are equipped with a self-contained utility billing meter. SDG&E now offers an optional virtual inspection process for interconnections of solar systems of any size that are not equipped with current transformer metering or a net generation output meter and do not require a visible, lockable disconnect.

III. CONCLUSION

SDG&E asks the Commission to accept this filing in compliance with the Decision.

Respectfully submitted,

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